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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 JUAN C. RIOS,

12 Plaintiff,

13 vs.

14 JOSEPH LOMBARDO, CLARK COUNTY
SHERIFF; and DOES 1-100, ROE
15 Corporations I – X, inclusive,

16 Defendants.

CASE NO.: 2:17-cv-03074-RFB-BNW

**STIPULATION TO EXTEND TIME TO
FILE A REPLY IN SUPPORT OF THE
MOTION FOR RECONSIDERATION
[ECF No. 79]**

17 Defendant Joseph Lombardo (“Lombardo”), through his counsel, Kaempfer Crowell, and
18 Plaintiff Juan C. Rios, through his counsel, Hamilton Law, stipulate and agree to extend the
19 current deadline of November 7, 2023, for Lombardo to file a Reply in support of the Motion for
20 Reconsideration, (ECF No. 79), by seven days, which will create a new deadline of **November**
21 **14, 2023.**

22 1. On October 17, 2023, Defendant Lombardo filed a Motion for Reconsideration,
23 (ECF No. 79).

24 2. Plaintiff timely filed a Response, (ECF No. 80), on October 31, 2023.

1 3. Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1 impose a good cause
2 standard to extend the deadline file a Reply. “‘Good cause’ is a non-rigorous standard that has
3 been construed broadly across procedural and statutory contexts.” *Ahanchian v. Xenon Pictures,*
4 Inc., 624 F.3d 1253, 1259 (9th Cir. 2010).

5 4. Good cause exists to extend the deadline for Lombardo to file the Reply by one
6 week in light of Lombardo’s counsel briefly being ill and deadlines in other matters before the
7 Court arising at the same time as the Reply’s current due date of November 7, 2023.

8 5. An extension of time will ensure that the Court has appropriate briefing on
9 Lombardo’s Motion for Reconsideration before making a ruling. Neither party will suffer
10 prejudice from an extension of time.

11 DATED this 6th day of November, 2023.

12 KAEMPFER CROWELL

HAMILTON LAW

13 By: /s/ Lyssa S. Anderson

By: /s/ Ryan A. Hamilton

14 LYSSA S. ANDERSON

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Attorneys for Defendant

Joseph Lombardo

18 **IT IS SO ORDERED.**

19 DATED this 7th day of November 2023.

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UNITED STATES DISTRICT COURT JUDGE